

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

AIR QUALITY CONSTRUCTION PERMIT

UniSea Dutch Harbor Facility
Permit No. 088CP01

Final – August 13, 2003

The Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues a construction permit to the permittee, UniSea Inc., for the Fish Oil Project at the Dutch Harbor Facility, and to impose additional limits to protect Ambient Air Quality.

This permit satisfies the obligation of the owner and operator to obtain a construction permit as set out in AS 46.14.130(a).

As required by AS 46.14.120(c), the permittee shall comply with the terms and conditions of this construction permit.

John F. Kuterbach, Manager

Air Permits Program

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List of Abbreviations Used in this Permit

AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
AS	Alaska Statutes
ASTM	American Society of Testing and Materials
CEMS	Continuous Emission Monitoring System
C.F.R.	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
EPA	US Environmental Protection Agency
HAPS	Hazardous Air Pollutants [hazardous air contaminants as defined in AS 46.14.990(14)]
HHV	Higher heating value
ID	Source Identification Number
MACT	Maximum Achievable Control Technology
NAICS	North American Industry Classification System
NESHAPs	Federal National Emission Standards for Hazardous Air Pollutants [as defined in 40 CFR 61]
NSPS	Federal New Source Performance Standards [as defined in 40 CFR 60]
PS	Performance specification
PSD	Prevention of Significant Deterioration
RM	Reference Method
SIC	Standard Industrial Classification

Units

acf	actual cubic foot
Btu	British Thermal Unit (1 Btu = 1,055 Joules)
dscf	Dry standard cubic foot
gr.	grain (1 pound = 7000 grains)
GPH	gallons per hour
hp	horsepower (bhp is horsepower at shaft) (1kW = 1,341 hp)
kW	kilowatts
MM	million (1 MM Btu = 10 ⁶ Btu)
PPM	Parts per million
PPMV	Parts per million volume
TPH	Tons per hour
TPY	Tons per year
Wt%	weight percent

Pollutants

CO	Carbon Monoxide
H ₂ S	Hydrogen Sulfide
NO _x , NO ₂	Oxides of Nitrogen, Nitrogen Dioxide respectively
PM ₁₀	particulate matter with aerodynamic diameter less than 10 microns
SO ₂	Sulfur dioxide
VOC	volatile organic compound [as defined in 18 AAC 50.990(103)]

Section 1 Identification

Names and Addresses

Permittee:	UniSea Inc., 88 Salmon Way P.O. Box 920008 Dutch Harbor, Alaska, 99692
Facility:	Dutch Harbor Facility
Location:	Section 3, Township 73 South, Range 118 West, Seward Meridan. UTM Coordinates Zone 3, Northing 5,971.148 km., Easting 398.189 km.
Physical Address:	Amaknak Island, Alaska Dutch Harbor, Alaska 99685
Owner:	UniSea Inc., P.O. Box 97019 Redmond, WA 98073-9719
Operator:	Same as Owner
Permittee's Responsible Official	Mr. Terry Shaff, President
Designated Agent:	CT Corporation System 801 W. 10 th Avenue, Suite 300 Juneau, AK 99801
Facility and Building Contact:	Mr. Al Spencer UniSea Inc., 88 Salmon Way P.O. Box 920008 Dutch Harbor, Alaska 99692
Fee Contact:	Ms. Lisa Petro UniSea, Inc., 15400 Northeast 90 th Street P.O. Box 97019 Redmond, Washington 98073-9719
SIC Code of the Facility:	2092 Prepared Fresh or Frozen Fish and Seafood

[18 AAC 50.320(a), 1/18/97]

Section 2 Emission Information and Classification

Emissions of Regulated Air Contaminants, as provided in permittee's application:

Oxides of Nitrogen (NO_x), Sulfur Dioxide (SO₂), Carbon Monoxide (CO), Particulate Matter, and Volatile Organic Compounds (VOC).

Construction Permit Classifications:

Note: Facility Classifications are described under 18 AAC 50.300(b) through (g), modification classifications are described under 18 AAC 50.300(h), and owner requested limits are described under 18 AAC 50.305(a)(1) through (4).

The Fish Oil Project requires a construction permit because:

- a. The facility is classified as a Prevention of Significant Deterioration (PSD) Major Facility under 18 AAC 50.300(c)(1), as the facility has a potential to emit more than 250 tons per year of a regulated air contaminant;
- b. The project is classified as a modification listed in 18 AAC 50.300(h)(2), as there will be an increase in actual emissions; and
- c. The owner has requested limits to avoid classification as a PSD significant modification under 18 AAC 50.300(h)(3), as provided by 18 AAC 50.305(a)(4).

[18 AAC 50.320(a)(2), 1/18/97]

Section 3 Fee Requirements

- 1. General Assessable Emissions.** The Permittee shall pay to the Department an annual emission fee based on the facility's assessable emissions as determined by the Department under 18 AAC 50.410. The assessable emission fee rate is set out in 18 AAC 50.410(b). The Department will assess fees per ton of each air contaminants that the facility emits or has the potential to emit in quantities greater than 10 tons per year. The quantity for which fees will be assessed is the lesser of

- 1.1 the facility's assessable potential to emit of 892.1 tpy ; or
- 1.2 the facility's projected annual rate of emissions that will occur from July 1 to the following June 30, based upon actual annual emissions emitted during the most recent calendar year or another 12 month period approved in writing by the department, when demonstrated by
 - a. an enforceable test method described in 18 AAC 50.220;
 - b. material balance calculations;
 - c. emission factors from EPA's publication AP-42, Vol. I, adopted by reference in 18 AAC 50.035; or
 - d. other methods and calculations approved by the Department.

- 2. Assessable Emissions Estimates.** Emission fees will be assessed as follows:

- 2.1 no later than March 31 of each year, the Permittee may submit an estimate of the facility's assessable emissions to ADEC, Air Permits Program, ATTN: Assessable Emissions Estimate, 410 Willoughby Ave., Juneau, AK 99801-1795; the submittal must include all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates; or
- 2.2 if no estimate is received on or before March 31 of each year, emission fees for the next fiscal year will be based on the potential to emit set out in condition 1.1.

[18 AAC 50.346; 4/1/02]

Section 4 Construction Permit Source Inventory

3. The sources listed in Table 1 below have specific monitoring, recordkeeping, or reporting conditions in this construction permit. The source description and rating are given for identification purposes only. The total facility equipment inventory is listed in Operating Permit No. 088TVP01 Revision 1, Table 1, dated September 16, 2002.

Table 1
Construction Permit No. 088CP01 Source Inventory

ID	Source Name	Source Description	Permitted	Fuel	Installation Date
1	Powerhouse Generator No. 1	FM 38TD8-1/8 OP 2,500 kW @ 720 RPM	2,252 kWe	Diesel/Fish oil	1990
2	Powerhouse Generator No. 2	FM 38TD8-1/8 OP 2,665 kW @ 900 RPM	2,300 kWe	Diesel/Fish oil	1990
3	Powerhouse Generator No. 3	FM 38TD8-1/8 OP 2,750 kW @ 900 RPM	2,300 kWe	Diesel/Fish oil	1990
4	Powerhouse Generator No. 4	FM 38TD8-1/8 OP 2,500 kW @ 720 RPM	2,252 kWe	Diesel/Fish oil	1990
5	Powerhouse Generator No. 5	FM 38TD-1/8 OP 2,750 kW @ 900 RPM	2,300 kWe	Diesel/Fish oil	1990
6	Powerhouse Generator No.6	FM 38TD-1/8 OP 2,500 kW @ 720 RPM	2,252 kWe	Diesel/Fish oil	1990
22	G 1 Main Tank	Fuel Storage tank	30,000 gallons	Diesel	Post - 1984
23	Central Boiler	Weil-McLain (Gordon-Piatt R 10.2-0)	4.1 MMBtu/hr	Diesel/Fish oil	1993
24	Attu Boiler	Weil-McLain (Gordon-Piatt WR 10.1-0)	2.4 MMBtu/hr	Diesel/Fish oil	1993

Notes:

- Source IDs 1 through 6 generator outputs are limited (governor/switchboard) to the Permitted outputs (kW electrical)
- Fuel diesel fuel or diesel fuel/fish oil blend.
- Source IDs 23 and 24 outputs are based on output ratings. Input rating for Source ID 23 (Central Boiler) estimated at 4.52 MMBtu/hr, and Source ID 24 (Attu Boiler) at 2.95 MMBtu/hr.

Section 5 Ambient Air Quality Standards and Maximum Allowable Ambient Concentrations

General Description. The conditions listed in this section ensure that allowable emissions from the Fish Oil Project, Source IDs 1 through 6, and Source IDs 23 and 24 (Weil McLain boilers) will not cause an ambient concentration that exceeds the concentrations established in Table 6 of 18 AAC 50.310(d)(2) at any location that does not or would not meet the ambient air quality standard or maximum allowable ambient concentration. In addition, the operational limits in this section ensure that the project avoids classification under 18 AAC 50.300(h)(3).

4. The Permittee shall **no later than August 30, 2003**, for Source IDs 1 through 6, extend the existing exhaust stacks or replace with stacks that meet the requirements of Table 2 “*Stack Modifications for Source IDs 1 through 6*”.
 - 4.1 **No later than August 30, 2003** submit to the department a written notice listing the date on which the stack modifications for the Source IDs 1 through 6 were completed, and report “as built” stack heights, orientation/location-plan and inside diameter of each stack after the modification. Include photographs showing each stack relative to the power plant and surrounding terrain.
 - 4.2 The Permittee may raise the stack heights of Source IDs 23 and 24 by up to 5 meters, provided that the stacks’ discharge velocity is not reduced.
 - 4.3 The Permittee shall promptly notify the Department of any stack modifications made under condition 4 and 4.2. The notification shall include Source ID, date of change, before and after stack height, and before and after stack exit diameter.
 - 4.4 Upon completion, and notification, of the Source IDs 1 through 6 stack modifications identified in Condition 4.1, the Permittee may operate Source IDs 1 through 6 simultaneously.

Table 2

Stack Modifications for Source IDs 1 through 6

Source ID	Description	Stack Height		Stack Orientation	Stack Rain Cap
		Existing Height [m]	Modified Height [m] No less than		
1	F M diesel generator	16.3	18.1	Vertical	No
2	F M diesel generator	16.3	18.1	Vertical	No
3	F M diesel generator	16.3	18.1	Vertical	No
4	F M diesel generator	16.3	18.1	Vertical	No
5	F M diesel generator	16.3	18.1	Vertical	No
6	F M diesel generator	16.3	18.1	Vertical	No
<ul style="list-style-type: none"> Stack height is the height in meters [m] measured from the existing grade to the top of the stack. The inside diameter of the modified stack is the same as the existing diameter 					

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5. The Permittee shall comply with the individual annual fuel consumption limits contained in Table 3 below. The annual fuel limits for Source IDs 23 and 24 shall not be exceeded during any 12 consecutive month period.

Table 3

Source Fuel Limits

Source ID	Design Capacity/Maximum Fuel Rate (each)	Allowable 12 month Gallon Cap
23	4.1 MMBtu/hr	178,000
24	2.4 MMBtu/hr	113,300

- 5.1 Monitor the monthly fuel consumption for Source IDs 1 through 6, 23, and 24 by installing and maintaining a totalizing fuel meter for each unit's fuel system that is accurate to within 5%. Record monthly the number of gallons consumed.
[18 AAC 50.350(g) & (h), 5/3/02]
- 5.2 Report in accordance with condition 14 the individual source fuel consumption for each six month of the reporting period. Include the rolling twelve-month total fuel consumption for each month of the reporting period. Include the date of the most recent fuel meter calibration or replacement.
- 5.3 Report in accordance with condition 13 if any of the sources' fuel consumption exceeds the limits set forth in this condition.
- 5.4 Report the total quantity of fuel deliveries and the dates of these deliveries from bulk suppliers to the Dutch Harbor Plant according to condition 14.
[18 AAC 50.350(i), 5/3/02]
6. The Permittee may use diesel and diesel oil/fish oil blend (blended fuel) in any proportion in Source IDs 1 through 6, 23, and 24.
- 6.1 Monitor the monthly diesel and blended fuel consumption in accordance with condition 5.1
- 6.2 Report in accordance with condition 14 the individual source diesel and blended fuel consumption for each of the past six months; include the rolling twelve-month total fuel consumption for each month of the six-month reporting periods. Include the date of the most recent fuel meter calibration or replacement.
- 6.3 Report in accordance with condition 13 if any of the sources' fuel consumption exceeds the limits set forth in this condition.

[18 AAC 50.350(i), 5/3/02]
[Construction Permit No. 9825-AA011, 1/17/97]

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7. The Permittee shall use diesel fuel or blended fuel with a total sulfur content no greater than 0.075% by weight.
- 7.1 Obtain a statement or receipt from the fuel supplier certifying the maximum sulfur content of the fuel for each shipment of fuel delivered to the facility. For the fish oil to be burned, obtain no less than once per twelve-month rolling period, a statement or receipt certifying the maximum sulfur content. If a certificate is not available from the supplier, analyze a representative sample of the fuel to determine the sulfur content using ASTM method D129-00, D1266-98, D1552-95, D2622-98, D4294-98, D4045-99, D-4294 or an alternative method approved by the department.
- 7.2 If the sulfur content of any diesel fuel delivery exceeds 0.075% by weight, than determine the fuel sulfur content of the blended fuel by calculating for each batch of blended fuel the weighted average percentage sulfur content of the fuel by using the formula:
- $$(\% \text{ BF} * \% \text{ S BF}) + (\% \text{ DF} * \% \text{ S DF}) / 100\% = \text{total S \% by weight of blend}$$
- Where:
- | | |
|--------|---|
| % BF | = Percentage Blended Fuel by weight |
| % S BF | = Percentage Sulfur content of Blended Fuel by weight |
| % DF | = Percentage Diesel Fuel by weight |
| % S DF | = Percentage Sulfur content of Diesel Fuel by weight |
| % S | = Percent Sulfur by weight |
- 7.3 Report per condition 13 whenever you receive fuel that does not meet the requirements of condition 7. When reporting under this condition, include a material balance calculation of the sulfur compound emissions, in PPM, expected from this fuel, made in accordance with condition 15.
- 7.4 Include in the facility operating report required by condition 14 a list of the fuel grades received at the facility during the reporting period, and any reports required by condition 7.3.
- 7.5 Keep records of the sulfur contents of each shipment of fuel, each calculated three-hour SO₂ concentration, and all test results and calculations required under conditions 7.1, 7.2, or 7.4. Report copies of the records with the facility operating report required by condition 14.
- 7.6 Report per condition 13 if a three-hour exhaust concentration, calculated pursuant to condition 7.3, is greater than 500 PPM.

[18 AAC 50.350(g) - (j), 1/18/97]

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8. Limit the total NO_x emissions from Source IDs 1 through 6 to no greater than 624.4 tons per twelve month rolling period.
- 8.1 The Permittee shall install, maintain, and operate in good working order a continuous system for recording and monitoring the operating hours for Source IDs 1 through 6.
[18 AAC 50.350(g) & (h), 1/18/97]
- 8.2 The Permittee shall install, maintain, and operate in good working order a continuous system for recording and monitoring the kilowatt-hours for each electric generator or group of generators Source IDs 1 through 6. The system shall have an accuracy of $\pm 5\%$.
[18 AAC 50.350(g) & (h), 5/03/02]
- 8.3 For each of the Source IDs 1 through 6 :
- a. Record the total diesel fuel consumption no less than once a month.
- b. Record the total blended fuel consumption no less than once a month.
- 8.4 Record the total monthly operating hours for each Source IDs 1 through 6.
- 8.5 Record the total monthly power generation (kilowatt-hours) for each Source ID 1 through 6.
- 8.6 Calculate and record the calculated total monthly NO_x emissions for each Source IDs 1 through 6 by using the methodology in condition 9.
- 8.7 Calculate and record the total NO_x emissions per 12 month rolling period for Source IDs 1 through 6 by summing the monthly calculated NO_x emissions determined in condition 8.6.
- 8.8 Report the total NO_x emissions per 12 month rolling period according condition 8.7. All reports are to be made in accordance with condition 14.
- 8.9 Report in accordance with condition 13 when the condition 8 limits are exceeded.
[18 AAC 50.350(i), 5/3/02]
9. Calculate the monthly NO_x emission rate for Source IDs 1 through 6 (expressed as NO₂) by using the following equations:
- 9.1 For Source IDs 1, 4, and 6 (720 RPM units) operating on diesel fuel use equation I for average loads greater than 65 %; use equation II for average load less or equal than 65%
- Equation I: Diesel Fuel
 $P_{avg} > 0.65$ $E = FC * [-0.14 * P_{avg}^2 + 0.55 * P_{avg} + 0.035] / 2,000$
- Equation II: Diesel Fuel
 $P_{avg} < 0.65$ $E = FC * 0.329 / 2,000$
-

Where: E = NOx emission rate [ton/month]
FC = is engine total diesel fuel consumption in gallons per month [gallon/month]
P_{avg} = Is the source monthly average power production expressed as a fraction of full permitted production; calculated by dividing the monthly energy production, in kWh, by monthly total operating hours of operation, and dividing again by full permitted production (2,252 kW)

$$P_{avg} = (\text{monthly total energy} / \text{monthly total hours}) / \text{permitted maximum load}$$

- 9.2 For Source IDs 2, 3, and 5 (900 RPM units) operating on diesel fuel use equation III for average loads greater than 65 % and use equation IV for average load less or equal than 65%

Equation III: Diesel Fuel

$$P_{avg} > 0.65 \quad E = FC * [-0.19 * P_{avg}^2 + 0.56 * P_{avg} + 0.012] / 2,000$$

Equation IV: Diesel Fuel

$$P_{avg} < 0.65 \quad E = FC * 0.276 / 2,000$$

Where: E = NOx emission rate [ton/month]
FC = is engine total diesel fuel consumption in gallons per month [gallon/month]
P_{avg} = Is the source monthly average power production expressed as a fraction of full permitted production; calculated by dividing the monthly energy production, in kWh, by monthly total operating hours of operation, and dividing again by full permitted production (2,300 kW)

$$P_{avg} = (\text{monthly total energy} / \text{monthly total hours}) / \text{permitted maximum load}$$

- 9.3 For Source IDs 1, 4, and 6 (720 RPM units) operating on blended fuel use equation V for average loads greater than 65 % and use equation VI for average load less or equal than 65%

Equation V: Blended Fuel

$$P_{avg} > 0.65 \quad E = FC * [-0.41 * P_{avg}^2 + 0.95 * P_{avg} - 0.146] / 2,000$$

Equation VI: Blended Fuel

$$P_{avg} < 0.65 \quad E = FC * 0.298 / 2,000$$

Where: E = NOx emission rate [ton/month]
FC = is engine total blended fuel consumption in gallons per month [gallon/month]
P_{avg} = Is the source monthly average power production expressed as a fraction of full permitted production; calculated by dividing

the monthly energy production, in kWh, by monthly total operating hours of operation, and dividing again by full permitted production (2,252 kW)

$$P_{avg} = (\text{monthly total energy} / \text{monthly total hours}) / \text{permitted maximum load}$$

- 9.4 For Source IDs 2, 3, and 5 (900 RPM units) operating on blended fuel use equation VII for average loads greater than 65 % and use equation VIII for average load less or equal than 65%

Equation VII: Blended Fuel

$$P_{avg} > 0.65 \quad E = FC * [-0.24 * P_{avg}^2 + 0.58 * P_{avg} - 0.023] / 2,000$$

Equation VIII: Blended Fuel

$$P_{avg} < 0.65 \quad E = FC * 0.252 / 2,000$$

Where: E = NOx emission rate [ton/month]
FC = is engine total blended fuel consumption in gallons per month [gallon/month]
P_{avg} = Is the source monthly average power production expressed as a fraction of full permitted production; calculated by dividing the monthly energy production, in kWh, by monthly total operating hours of operation, and dividing again by full permitted production (2,300 kW)

$$P_{avg} = (\text{monthly total energy} / \text{monthly total hours}) / \text{permitted maximum load}$$

- 9.5 For any period during which monthly fuel consumption records are not recorded or records are suspect, then use the maximum design fuel consumption for each recorded hour of source operation to calculate the NOx emissions under condition 9.

Section 6 State Emission Standards

10. Visible Emissions. The permittee shall not cause or allow visible emissions, excluding water vapor, emitted from Source IDs 1 through 6, 23, and 24 to reduce visibility through the exhaust effluent by any of the following:

- a. more than 20 percent for greater than three minutes in any one hour¹;
- b. more than 20 percent averaged over any six consecutive minutes².

10.1 Monitor, record and report according to Operating Permit No. 088TVP01, Revision 1, dated September 23, 2002, Section 13, Visible Emissions and Particulate Matter Monitoring Plan.

[18 AAC 50.055(a)(1), 8/15/02]
[18 AAC 50.320(a)(2)(A-E), 8/15/02]

11. Particulate Matter. The permittee shall not cause or allow visible emissions, excluding water vapor, emitted from Source IDs 1 through 6, 23, and 24 to exceed 0.05 grains per cubic foot corrected to standard conditions and averaged over three hours.

11.1 Monitor, record and report according to Operating Permit No. 088TVP01, Revision 1, dated September 23, 2002, Section 13, Visible Emissions and Particulate Matter Monitoring Plan.

[18 AAC 50.055(b)(1), 8/15/02]
[18 AAC 50.320(a)(2), 8/15/02]
[18 AAC 50.320(a)(2)(A-E), 8/15/02]

12. Sulfur Compound Emissions. The permittee shall not cause or allow sulfur compound emissions, expressed as SO₂, from Source IDs 1 through 6, 23 and 24 to exceed 500 PPM corrected to standard conditions and averaged over three hours.

12.1 Monitor, record, and report according to condition 5, "*Sulfur Compound Emissions*," of Operating Permit No. 088TVP01, Revision 1, dated September 23, 2002.

[18 AAC 50.055(c), 8/15/02]
[18 AAC 50.320(a)(2), 8/15/02]
[18 AAC 50.320(a)(2)(A-E), 8/15/02]

¹ For purposes of this permit, the "more than three minutes in any one hour" criterion in this condition will no longer be effective when the Air Quality Control (18 AAC 50) regulation package effective 5/3/02 is adopted by the U.S. EPA.

² The six-minute average standard is enforceable only by the state until 18 AAC 50.055(a)(1), dated May 3, 2002, is approved by EPA into the SIP at which time this standard becomes federally enforceable.

Section 7 Reporting Requirements

- 13. Excess Emission and Permit Deviation Reports.** Report excess emissions or permit deviations in accordance with condition 47, "*Excess Emission and Permit Deviation Reports*," of Permit No. 088TVP01 Revision 1, dated September 23, 2002.
- 14. Operating Reports.** Attach any notification required by this permit to the facility operating report required by condition 49, "*Facility Operating Reports*," of Permit No.088TVP01 Revision 1, dated September 23, 2002.
- 15. Material Balance Calculation.** Report the material balance calculation using the form required by Section 15, "*Material Balance Calculation*," of Permit No.088TVP01 Revision 1, dated September 23, 2002.

Section 8 Federal New Source Performance Standards Subpart Kb

- 16.** For Source ID 22 the Permittee shall keep readily accessible records for the life of the tank showing the dimensions and an analysis showing the capacity of the storage vessel

[18 AAC 50.040(a)(2)(M), 8/15/02]
[40 C.F.R. 60.110b(c) & 40 C.F.R. 60.116b(a) – (b) Subpart Kb, 7/1/01]

Section 9 Permit Documentation

November 20, 2002	E-mail from Alan Schuler (ADEC) to Herman Wong (EPA Region 10) requesting permission to use ISC-PRIME for UniSea's modeling analysis.
November 25, 2002	E-mail from Herman Wong (EPA Region 10) to Alan Schuler (ADEC) approving use of ISC-PRIME for UniSea's modeling analysis.
December 6, 2002	UniSea submitted to ADEC a Construction permit Application for UniSea's Dutch Harbor Facility.
December 27, 2002	UniSea submitted to Alan Schuler (ADEC) electronic modeling files in support of the application.
February 11, 2003	Letter from Jim Baumgartner (ADEC) to Terry Shaff (UniSea) listing additional information needed for a complete application.
February 25, 2003	E-mail from John Steigers (Steigers) to Albert Faure (ADEC) additional information emission source inventory.
March 4, 2003	Letter from John Steigers (Steigers) to Jim Baumgartner (ADEC) with response to ADEC's February 11, 2003 letter.
March 14, 2003	E-mail from Alan Schuler (ADEC) to Tom Gibbons (Steigers) transmitting incompleteness items regarding UniSea's PM-10 modeling analysis.
April 24, 2003	E-mail from Tom Gibbons (Steigers) to Alan Schuler (ADEC) with response to ADEC's PM-10 modeling issues.
April 24, 2003	Letter from John Steigers (Steigers) to Alan Schuler (ADEC) transmitting revised modeling files.
May 6, 2003	Letter from John Steigers (Steigers) to Jim Baumgartner (ADEC) proposed application revisions.
May 30, 2003	Memorandum from Alan Schuler (ADEC) to file approving UniSea's modeling analysis.